

EXHIBIT 4

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

REGMON L. HAWKINS, *individually and
on behalf of all others similarly situated,*

Plaintiff,

v.

S2VERIFY, *a foreign limited liability
company,*

Defendant.

Case No. 3:15-cv-03502 WHA

**DECLARATION OF REGMON L.
HAWKINS IN SUPPORT OF
MOTION FOR CLASS
REPRESENTATIVE SERVICE
AWARD**

Date: February 9, 2017
Time: 8:00 a.m.
Place: Courtroom 8, 19th Floor
Hon. William H. Alsup

**CLASS ACTION
JURY TRIAL DEMANDED**

I, Regmon L. Hawkins, declare as follows:

1. My name is Regmon L. Hawkins. I am over 21 years of age, of sound mind, capable of

executing this Declaration, and have personal knowledge of the facts stated herein, and they are all true and correct.

2. I am the plaintiff in the above-styled litigation. I previously submitted a declaration in this case in support of the motion for class certification filed by my attorneys. In the order by the Court certifying a class, I was appointed as class representative.

3. I have taken my duties in this case as class representative seriously. Throughout the case, I have monitored the progress of the lawsuit, assisted in responding to the multiple sets of discovery served by the defendant S2Verify, and had my deposition taken. In doing so, I have had my name and personal details – including information about criminal convictions from more than 20 years ago – made public.

4. In December 2015, before my deposition was taken and before I assisted my counsel in responding to discovery, I received a settlement offer from S2Verify in the amount of \$13,000. As I understood it, the offer would have settled all of my claims in this case, including those I bring on behalf of the class. I rejected that offer because I wanted to continue to pursue this case on behalf of the thousands of other class members who, like myself, had their consumer reports sold by S2Verify and which my attorneys and I believed contained criminal history information in violation of the Fair Credit Reporting Act.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct.

Dated: 1T


Regmon L. Hawkins